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10
11 *Attorney for Nationstar Mortgage LLC*
12 *dba Mr. Cooper*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 SFR INVESTMENTS POOL 1, LLC,

16 Case No. 2:22-cv-00388-APG-VCF

17 Plaintiff,

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

vs.

18 NATIONSTAR MORTGAGE LLC D/B/A
19 MR. COOPER; DOES I through X; and ROE
20 BUSINESS ENTITIES I through X, inclusive,

FIRST REQUEST

21 Defendants.

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23 SFR Investments Pool 1, LLC (“SFR”) and Nationstar Mortgage LLC dba Mr. Cooper (“Nationstar”) (collectively, the “Parties”), by and through their respective counsel, pursuant to EDCR 2.35, hereby stipulate and agree to extend the discovery deadlines as set forth within. This stipulation is being entered into in good faith and is not made for the purposes of delay but to enable the parties to negotiate a settlement before the need to conduct depositions or incur unnecessary charges. The deadline for the close of discovery is now April 19, 2023.

24 **A. DISCOVERY COMPLETED TO DATE:**

- 25 1. SFR’s initial NRCP 16.1 disclosures;
- 26 2. SFRs first set of interrogatories, requests for production of documents and requests for admission have been served on Nationstar, and Nationstar is responding;
- 27 3. Nationstar and Fannie’s NRCP 16.1 disclosures.

1 4. Nationstar's first set of interrogatories, requests for production of documents and
2 requests for admission to SFR have been served and SFR is responding.

3 **B. DISCOVERY THAT REMAINS TO BE COMPLETED:**

4 The parties need to complete the following discovery:

- 5 1. Deposition of NRCP 30(b)(6) witness for Nationstar;
6 2. Deposition of NRCP 30(b)(6) witness for SFR.

7 **C. REASONS WHY DISCOVERY DEADLINE SHOULD BE EXTENDED:**

8 The parties have been involved in other similar litigation and believe they will be able to
9 explore and possibly obtain settlement in the near future. However, counsel for both parties are
10 currently facing emergencies in other matters and are unable to negotiate settlement before the
11 close of discovery. Counsel for Nationstar has been dealing with a situation where his colleague
12 quit on March 31, 2023, and he has unexpectedly been assigned a large number of cases. Counsel
13 for SFR has trial and two Ninth Circuit arguments that are interfering with her ability to assess
14 settlement before the close of discovery.

15 Although the parties are not yet able to negotiate a settlement, they would like to have the
16 opportunity to explore settlement before it becomes necessary to conduct depositions. They,
17 therefore, seek to extend the discovery deadline in order to give them room to negotiate a potential
18 settlement.

19 Good cause exists to grant the extension despite the parties not filing the instant stipulation
20 21 days before the close of discovery because the parties began discussing the issue of extending
21 to explore settlement which the parties have reached in other cases, at or near the 21-day mark. It
22 took an extra few days to communicate the agreement and then draft and approve the stipulation.

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1 **D. PROPOSED DISCOVERY DEADLINES:**

2 The following proposed deadlines were agreed upon by the parties:

- 3 a. Close of discovery: **July 7, 2023** (Current deadline is April 19, 2023)
- 4 b. Final day for dispositive motions: **August 7, 2023** (Current deadline is May
- 5 19, 2023)
- 6 c. Pre-Trial Order: **September 7, 2023** (Current deadline is June 20, 2023)
If dispositive motions are filed, the deadline
for filing the joint pretrial order will be suspended until 30 days after
decision on the dispositive motions or further court order.

7 DATED this 6th day of April, 2023.

8 DATED this 6th day of April, 2023.

9 **HANKS LAW GROUP**

10 /s/ Karen L. Hanks

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Mr. Cooper*

15 **ORDER**

16 **IT IS SO ORDERED**

17 IT IS SO ORDERED.

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19 _____
20 Cam Ferenbach
21 United States Magistrate Judge

22 4-17-2023

23 DATED _____